

REMARKS

Applicants respectfully request that the above-identified application be re-examined.

The final Office Action ("Office Action") mailed on February 26, 2003, rejected all of the claims (1-23) of the above-identified application. Claims 1, 7-8, 11, 13, and 19-23 were rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter not described in the specification. Claims 1-5, 7-9, 12, 20, and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of U.S. Patent No. 6,233,624 to Hyder et al. ("Hyder") and the background portion of the applicants' specification ("APA"). Claims 6, 10-11, 13-19, 21, and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hyder in view of U.S. Patent No. 5,978,815 to Cabrera et al. ("Cabrera") and the APA. Independent Claims 1, 13, and 20-23 have been amended to more clearly point out and claim the patentable invention and distinctly claim the subject matter the applicants regard as their invention. Various dependent claims have been amended to maintain language consistency. No claims have been canceled. Thus, the claims pending for reconsideration are Claims 1-23. Applicants respectfully submit that the rejection of Claims 1-23 is in error, should be withdrawn, and this application allowed.

Prior to discussing the reasons why applicants believe that the amended claims in this application are allowable, a brief discussion of the present invention, followed by a brief discussion of cited and applied references, is presented. The following discussion of applicants' invention and the cited and applied references is not provided to define the scope or interpretation of any of the claims in this application. Instead, these discussions are provided to help the United States Patent and Trademark Office ("the Office") better appreciate important claim distinctions discussed thereafter.

Summary of the Invention

The present invention addresses one of the shortcomings of supporting a kernel mode driver that provides management and diagnostic data in enterprise networks, namely, the burden associated with the need for manufacturers to independently develop software methods and functions to incorporate into device drivers in order to support a device driver monitor and control management system, such as the Windows Management Instrumentation ("WMI") system. As described in the specification of the present application, a device driver monitor and control management system, such as the WMI system, monitors and controls the operation of device drivers. The prior art need for manufacturers to independently develop software methods and functions to incorporate into device drivers has created a burden shared by every developer

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of device drivers intended to be used with the device driver and monitor control management system. Additional time is required for each developer to produce both the code specific to the developer's device and the code specific to the device driver and monitor control management system. Further, because similar code is often included in the device drivers that support the device driver monitor and control management system, functionally identical code is often loaded into memory by several drivers. The result is inefficient operation that requires more overhead than necessary to support the device driver and monitor control management system. Overall system performance may suffer. Also, the likelihood of encoding errors or "bugs" is increased due to many disparate developers creating code that performs substantially the same function.

The present invention addresses the above-described needs and disadvantages by providing a set of common software routines that may be accessed by device drivers in support of the device driver and monitor control management system. The set of common routines includes typical routines that would ordinarily be executed by device drivers designed to function with the device driver and monitor control management system. The common routines reside in a library, dynamically accessible by the device drivers. When a device driver receives a message from the device driver monitor and control management system, if appropriate, the device driver passes the message to the library to be handled in a common manner. In this manner, the developers of device drivers that support the device driver monitor and control management system need develop only the code necessary to support any unique features or data storage of the hardware associated with the device drivers. The result is shortened development time and fewer programming errors. In addition, the overall system performance may be improved because fewer instances of similar code are loaded in memory to support the device driver monitor and control management system. The present invention is particularly advantageous in enterprise networks, i.e., networks that include multiple devices, such as printers, fax machines, etc., that interact with multiple driving sources, such as computers, work stations, etc.

One exemplary embodiment of the present invention provides an extension to a device driver operating in kernel mode. This exemplary embodiment allows instrumentation data, such as data to configure device settings and supply event notification from device drivers, to pass between user and kernel mode. Such data passage allows a device driver monitor and control management system to access device drivers, even if they are kernel mode drivers. Device driver monitor and control management system access is provided by a set of common software routines that may be accessed by device drivers in support of the management system. The

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common routines include typical routines that would ordinarily be executed by device drivers designed to operate with a device driver monitor and control management system. The common routines reside in the common driver library accessible by the device drivers. When a device driver receives a message from the device driver monitor and control management system, if appropriate, the device driver passes the message to the library to be handled in a common manner.

In addition to the other advantages described above, the use of common routines stored in a library allows the stored routines to be modified without affecting the related drivers so long as each driver's interface to the library is maintained.

Summary of the Principal References Cited

The Hyder Reference (U.S. Patent 6,233,624)

Hyder provides a system for incorporating a link layer intermediate driver into a data flow path in a computer operating system. The data flow path is a path of execution that is traversed through a network protocol stack. The network protocol stack defines a data flow path through which data is passed between a transport layer and a physical device connected to a network. Generally, a network protocol stack comprises a transport layer driver, one or more link layer intermediate drivers, and a link layer device driver interfacing with the physical hardware or device. The link layer intermediate driver receives data and returns processed data through an abstract interface while a link layer device driver is comprised of an interface with the abstract interface and a separate interface with the physical device. The abstract interface is comprised of a function library, which handles many of the details involved in managing synchronous and asynchronous communications across a network. The abstract interface also provides a library of functions for interfacing to the kernel mode of an operating system. Device drivers, therefore, need only perform hardware-specific operations needed to manage a particular piece of hardware or physical device. In contrast, traditional drivers inherently incorporate most of the above functionality, which makes such device drivers much harder to write to and debug, and often operate slower.

Essentially, Hyder discloses providing a driver library separate from a device driver. However, Hyder does not disclose, teach or suggest a device driver monitor and control management system, let alone a device driver monitor and control management system in communication with device drivers.

The Cabrera Reference (U.S. Patent 5,978,815)

The Cabrera reference provides a model where a plurality of drivers or client processes cooperate to fulfill an input/output ("I/O") request. The drivers or data managers may have a layered relationship to each other such that each is responsible for processing a particular portion of an I/O request. Information may be passed from one driver to another driver using I/O request packets ("IRPs") so that all drivers cooperate to fulfill an I/O request.

Cabrera does not disclose, teach, or suggest a device driver monitor and control management system, i.e., a management system for monitoring and controlling device drivers.

The Claims DistinguishedRejection of Claims 1, 7-8, 11, 13, and 19-23 Under 35 U.S.C. § 112, first paragraph

Claims 1, 7-8, 11, 13 and 19-23 were rejected under 35 U.S.C. § 112, first paragraph, for reciting a "SAI management system." Claims 1, 7-8, 11, 13, and 19-23 have been amended to remove all reference to an "SAI" qualification to a "management system." The independent claims (1, 13, 20-23) now recite a "device driver monitor and control management system." In this regard, the description of the preferred embodiment of the invention specification of this application describes the interaction between device drivers and the WMI system (page 6, lines 4-9). The WMI is one form of a management system for monitoring and controlling system resources (e.g., device drivers). See the attached copy of page 570 of the Fifth Edition of the Microsoft Computer Dictionary, which includes a Windows Management Instrumentation (WMI) definition. Since a device driver monitor and control management system is described in the application, applicants submit that the rejection of Claims 1, 7-8, and 19-23 has been rendered moot by the amendment described above and request that it be withdrawn.

Rejection of Claims 1-5, 7-9, 12, 20 and 22 Under 35 U.S.C. § 103(a)

As noted above, independent Claims 1, 20, and 22 have been amended to more clearly point out and distinctly claim the present invention. Accordingly, applicants submit that the 35 U.S.C. § 103(a) rejection of Claims 1 and 20 and the claims dependent thereon, listed above, no longer applies. More specifically, as an example, as amended, Claim 1 reads as follows:

1. A computer-readable medium having computer executable components, comprising:
a device driver configured to provide information and perform actions associated with a hardware device; and

a driver library containing software routines for making the information provided by and the actions performed by the device driver accessible to a device driver monitor and control management system, the library being accessible by the device driver to handle messages issued to the device driver by the device driver monitor and control management system.

the library being accessible by the device driver to handle messages issued to the device driver from the management system.

The Office Action is correct insofar as it correctly points out that Hyder does not explicitly teach a management system. However, the Office Action improperly states that it would have been obvious to combine the teachings of the APA with the system of Hyder. The only motivation cited (citing page 1, lines 8-16, of the application) in the Office Action to support this combination is from the disclosure of the present application. M.P.E.P. § 2143 (and the case excerpt therein) clearly states that the teaching or suggestion to make the claimed combination must be found in the prior art, not in applicants' disclosure. Accordingly, any teaching or suggestion for such a combination must come from the prior art. There is no mention of such a prior art motivation in the Office Action.

Additionally, Claim 1, as amended, recites a "device driver monitor and control management system." Similar language has been added to Claims 20 and 22. Hyder has no teaching or suggestion of such a management system, or any management system consistent with the applicants' invention, either explicitly or implicitly. The "transport" of Hyder (Column 5, lines 53-55) is not a teaching or suggestion of a management system, let alone a device driver monitor and control management system as recited in independent Claims 1, 20, and 22. Thus, applicants submit that one of ordinary skill in the art would not have been motivated to modify Hyder to include a device driver monitor and control management system, as Hyder includes no teaching or suggestion of a motivation to do so. While applicants believe that the rejection of independent Claims 1, 20, and 22 using applicants' APA disclosure as a motivation to make a combination is improper, even if proper, the resulting combination is not motivated by the combination of Hyder and the APA. While Hyder purportedly teaches a device driver library, neither the APA nor Hyder teaches or even remotely suggests how such a library could be used in combination with a device driver monitor and control management system. Only applicants' disclosed invention teaches or suggests this subject matter. As discussed more fully below, this combination uses applicants' disclosure in an improper hindsight manner. In summary, neither Hyder nor the APA, alone or in combination, teaches, discloses or suggests all the elements of Claims 1, 20, and 22. Therefore, applicants submit that Claims 1, 20, and 22 are allowable.

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As Claims 2-5, 7-9, and 12 all depend from allowable Claim 1, Claims 2-5, 7-9, and 12 are submitted to be allowable for at least the reasons noted above.

Claims 2-12 contain additional recitations that further distinguish them from the teachings of Hyder and/or the APA, alone or in combination and, thus, are submitted to be allowable for additional reasons. For example, Claim 7 recites "the method being operative to pass additional information between the device driver and the device driver monitor and control management system." There is no teaching, disclosure, or suggestion in Hyder and/or the APA, alone or in combination, of a software routine that is configured to execute a method associated with the information associated with the hardware device, and operative to pass additional information between the device driver and a device driver monitor and control management system. Hyder's purported teaching of communication between drivers (Column 6, lines 13-48) is not a teaching or suggestion of communication with a device driver monitor and control management system. Hyder merely teaches that one driver may pass a message to another driver. There is no hint in Hyder of any management system, much less a device driver monitor and control system, or of passing additional information to such a management system, as recited in Claim 7. Further, the Office Action cites no other reference that either teaches, discloses, or suggests information passing to such a management system. Accordingly, Claim 7 and its dependent claim, Claim 8, are submitted to be allowable for this reason as well.

Rejection of Claims 6, 10-11, 13-19, 21, and 23 Under 35 U.S.C. § 103(a)

Independent Claims 13, 21, and 23 have been amended to more clearly point out and distinctly claim the present invention. Accordingly, applicants submit that the 35 U.S.C. § 103(a) rejection of these claims, and the claims dependent therefrom, identified above, no longer applies. More specifically, by way of example, as amended, Claim 13 reads as follows:

13. A computer-readable medium having computer-executable instructions for providing management information to a device driver monitor and control management system, which, when executed, comprise:

receiving an input/output request packet ("IRP") message from the device driver monitor and control management system, the IRP message including instructions regarding data maintained by an instrumented hardware device;

passing the IRP to a driver library containing software routines for handling the instructions of the IRP message; and

handling the IRP message by the driver library.

As already noted above with regard to Claim 1, Hyder does not teach, disclose, or suggest a management system, let alone providing management information to a device driver monitor and control management system. Nor does Cabrera teach, disclose, or suggest this subject matter. In this regard, applicants specifically disagree with the Office Action's assertion that Cabrera's "client process" is a management system. Even if correct, which applicants specifically deny, Cabrera's "client process" is not a device driver monitor and control system.

No reasons why it would have been obvious to combine the APA with either Hyder or Cabrera are presented in the Office Action, and applicants maintain that there is no motivation to combine the APA with either Hyder or Cabrera, reference being made to the foregoing discussion of the applicability of the teaching of the APA and Hyder to Claim 1. None of the cited and applied references discloses, teaches, or even remotely suggests receiving an input/output request packet ("IRP") message from a device driver monitor and control management system as recited in Claims 13, 21, and 23. As neither Hyder, Cabrera, or the APA, alone or in combination, teaches, discloses, or suggests any IRP message from or to a device driver monitor and control management system, Claims 13, 21, and 23 are submitted to be allowable.

As Claims 14-19 all depend from Claim 13, Claims 14-19 are submitted to be allowable for at least the reasons noted above. Additionally, Claims 6 and 10-11 are submitted to be allowable as they depend from Claim 1, which is submitted to be allowable for the reasons noted above.

Furthermore, Claims 6, 10-11, and 14-19 include recitations that further distinguish them from the teachings of Hyder and Cabrera and, thus, are submitted to be allowable for additional reasons. For example, Claim 11 recites "the driver library is further configured to receive, from the device driver, an identifier for a particular IRP, to execute a particular software routine related to handling the IRP and to return to the device driver monitor and control management system any information received from the hardware device as a result of handling the IRP." Neither Hyder nor Cabrera teaches, discloses, or suggests returning to a management system any information retrieved from a hardware device, regardless of the form of the information. As noted above, applicants disagree with the Office Action's assertion that Cabrera's teaching a "client process" is a teaching of a management system. The client process of Cabrera is simply a procession user mode making an I/O request (Column 23, line 33, through Column 25, line 7). Accordingly, Claim 11 is submitted to be allowable for this reason as well.

Similarly, Claim 19 recites "the driver library is further configured to format data received from the device driver in a format consistent with the device driver monitor and control

management system." Hyder merely teaches "decoding and branching to the applicable operative procedure." Nowhere does Hyder teach a management system or data formatted into a format consistent with a management system, much less a device driver monitor and control management system. As neither Hyder nor Cabrera teaches, discloses, or suggests data formatted into a format consistent with such a management system, Claim 19 is submitted to be allowable for this reason as well.

Combination of References

As already noted above, the combination of Hyder with the APA is improper. The only suggestion cited in the Office Action for combining Hyder with the APA is from the applicants' disclosure. Accordingly, Claims 1-9, 7-9, 12, 20, and 22 were improperly rejected in view of such a combination and, thus, are submitted to be in condition for allowance.

The Office Action also states that Hyder combined with the APA teaches all the elements of Claims 6, 10-11, 13-19, 21, and 23 except IRPs and that Cabrera teaches IRPs. Applicants submit that the rejections of Claims 6, 10-11, 13-19, 21, and 23 are predicated on combining prior art references that contain no teaching or suggestion of how the cited references could be combined in any manner, much less the manner recited in the rejected claims. Simply put, the cited and applied prior art taken alone or in combination simply does not teach or suggest the subject matter of Claims 6, 10-11, 13-19, 21, and 23. The Office Action fails to point out any suggestion in the prior art of the desirability of the suggested modification absent the Office Action's interpretation of the teachings of the applicants' disclosure. The rejection is using hindsight reasoning based on an inappropriate interpretation of the present disclosure to "produce" the claimed invention. The references themselves do not teach or suggest how they could be combined in any manner, much less the manner recited in the rejected claims.

In this regard, the Examiner's attention is directed to the following Federal Circuit and C.C.P.A. decisions:

The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, **not in applicant's disclosure**. *In re Vaack*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). (Emphasis added.)

It is wrong to use the patent in suit as a guide through the maze of prior art references, combining the right references in the right way so as to achieve the result of the claims in suit. Monday morning quarterbacking is quite improper when resolving the question of nonobviousness in a court of law. *Orthopedic Equipment, Inc. v. United States*, 217 U.S.P.Q. 193, 199 (Fed. Cir. 1983).

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Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching or suggestion supporting the combination. Under Section 103, teachings of references can be combined only if there is some suggestion or incentive to do so. *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984).

The *ACS Hospital Systems, Inc. v. Montefiore Hospital* decision has been cited with approval by the Federal Circuit. See *In re Geiger*, 2 U.S.P.Q. 2d 1276, 1278 (Fed. Cir. 1987). Similar statements have been made in many decisions of the Board of Appeals.

Nor do we see any suggestion in either of the references which would lead anyone having ordinary skill in the art to combine the structure taught by either reference with that taught by the other.

In order to justify a combination of references such as is here suggested it is necessary not only that it be physically possible to combine them, but the art should contain something to suggest the desirability of doing so. Since the art does not suggest the use of either of the patented devices for . . . there is nothing to indicate that one should be modified in view of the other for that purpose. *Ex parte Walker*, 135 U.S.P.Q. 195, 196 (Bd. App. 1962).

We have studied the references and the manner in which the examiner proposes to combine their teachings but we are unable to find in these references any suggestion that they should or could be combined, absent appellant's disclosure in the present application. *Ex parte Lennox*, 144 U.S.P.Q. 224, 225 (Bd. App. 1964).

While as an abstract proposition it might be possible to select features from the secondary references, as the examiner has done, and mechanically combine them with the Mallin device to arrive at appellant's claimed combination, we find absolutely no basis for making such combination neither disclosed nor suggested in the patents relied upon. In our view only appellant's specification suggests any reasons for combining the features of the secondary references with the primary reference and under the provisions of 35 U.S.C. 103 that does not constitute a bar. *Ex parte Fleischmann*, 157 U.S.P.Q. 155 (Bd. App. 1967). (Emphasis added.)

In the instant application, the examiner has done little more than cite references to show that one or more elements or subcombinations thereof, when each is viewed in a vacuum, is known. The claimed invention, however, is clearly directed to a

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combination of elements. That is to say, appellant does not claim that he has invented one or more new elements but has presented claims to a new combination of elements. To support the conclusion that the claimed combination is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed combination or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 U.S.P.Q. 972, 973 (Bd. App. 1985). (Emphasis added.)

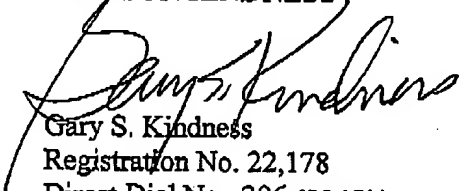
In summary, applicants submit that Claims 1-23 are clearly allowable in view of a lack of teaching, suggestion, or modification in the cited and applied references. Furthermore, even if the references were combinable in the manner discussed in the remarks accompanying the rejection of the claims, and applicants specifically deny such combinability, the resultant combination would not meet all of the recitations of the claims, as noted above.

CONCLUSION

In view of the foregoing remarks, applicants submit that the present application is now in condition for allowance. Reconsideration and reexamination of this application, as amended, allowance of the rejected claims, and passage of the application to issue at an early date are respectfully solicited. If the Examiner has any questions or comments concerning this application, the Examiner is invited to contact the applicants' undersigned attorney at the number below.

Respectfully submitted,

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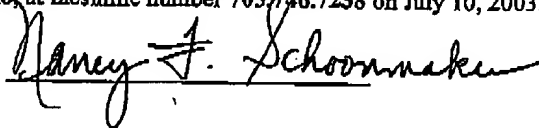

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I hereby certify that this correspondence is being transmitted via facsimile to the U.S. Patent and Trademark Office, Group Art Unit 2126, Examiner The T. Ho, at facsimile number 703.746.7238 on July 10, 2003.

Date:

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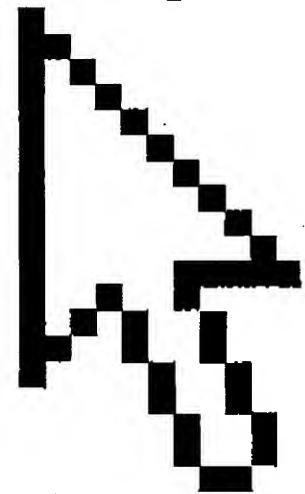
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Microsoft

Microsoft

Computer Dictionary

Fifth Edition



Windows IP Configuration

Windows Media Technologies

high-end scanners and allows retrieving of still images from IEEE 1394-based DV camcorders and USB-based Web cams. *Acronym:* WIA.

Windows IP Configuration *n.* See Winipcfg.

Windows Management Instrumentation *n.* A management infrastructure in Windows that supports monitoring and controlling system resources through a common set of interfaces and provides a logically organized, consistent model of Windows operation, configuration, and status. *Acronym:* WMI. See also resource.

Windows Me *n.* Released in 2000, the Windows Millennium Edition (Windows Me) operating system designed for home users as an upgrade from Windows 95 or Windows 98. Windows Me offers an improved home user experience including making it easier for users to share and manipulate digital photos, music, and videos, enhanced home networking capabilities, a rich Internet experience with support for broadband connections, different Internet communication tools, and online gaming.

Windows Media Audio *n.* A digital audio coding scheme developed by Microsoft that is used in distributing recorded music, usually over the Internet. Windows Media Audio shrinks the size of the audio file by a factor of 20 to 24 without seriously degrading the quality (CD-recording level) of the sound. Windows Media Audio files are given the file extension .wma and can be created with Windows Media Tools and played with the Windows Media Player. *Acronym:* WMA. See also Windows Media Technologies. Compare MP3, RealAudio, Secure Digital Music Initiative.

Windows Media Encoder *n.* A Windows Media technology that compresses live or prerecorded audio and video into a Windows Media stream, which can either be distributed immediately or saved as a Windows Media file for later distribution. The technology allows content developers to convert both live and prerecorded audio, video, and computer screen images to Windows Media Format for live and on-demand delivery. Windows Media Encoder also can save a stream as a Windows Media file and convert a file into Windows Media Format. Windows Media Encoder can distribute a stream via HTTP protocol. Also called: (if context is clear) Encoder, the encoder, the encoder engine.

Windows Media Player *n.* A client/control that receives a stream from a Windows Media server or local content for playback. It can run as a stand-alone client executable program. Windows Media Player can also be embedded in

a Web page, a C++ program, or a Microsoft Visual Basic program that uses the client ActiveX control.

Windows Media server *n.* A server on which Windows Media Services has been installed.

Windows Media Services *n.* A digital media platform that runs on a server, such as Windows 2000, to support streaming media, such as video and audio.

Windows Media Technologies *n.* Microsoft technologies for the creation, delivery, and playing of streaming audio and video over a network, including both intranets and the Internet. Windows Media Technologies, downloadable from the Microsoft Web site, support both live and on-demand (delivered from storage) content and are based on files delivered in Advanced Streaming Format (ASF). Three major components—Windows Media Tools, Windows Media Services, and Windows Media Player—comprise Windows Media Technologies. See the table. See also Advanced Streaming Format. Compare Real System G2.

Table W.2 ATA Specifications.

Component	Purpose	Related
Windows Media Tools	Content creation	ASX, SPX, WMA, WMV, WMV2, WMV3, WMV9, WMV10, WMV11, WMV12, WMV13, WMV14, WMV15, WMV16, WMV17, WMV18, WMV19, WMV20, WMV21, WMV22, WMV23, WMV24, WMV25, WMV26, WMV27, WMV28, WMV29, WMV30, WMV31, WMV32, WMV33, WMV34, WMV35, WMV36, WMV37, WMV38, WMV39, WMV40, WMV41, WMV42, WMV43, WMV44, WMV45, WMV46, WMV47, WMV48, WMV49, WMV50, WMV51, WMV52, WMV53, WMV54, WMV55, WMV56, WMV57, WMV58, WMV59, WMV60, WMV61, WMV62, WMV63, WMV64, WMV65, WMV66, WMV67, WMV68, WMV69, WMV70, WMV71, WMV72, WMV73, WMV74, WMV75, WMV76, WMV77, WMV78, WMV79, WMV80, WMV81, WMV82, WMV83, WMV84, WMV85, WMV86, WMV87, WMV88, WMV89, WMV90, WMV91, WMV92, WMV93, WMV94, WMV95, WMV96, WMV97, WMV98, WMV99, WMV100, WMV101, WMV102, WMV103, WMV104, WMV105, WMV106, WMV107, WMV108, WMV109, WMV110, WMV111, WMV112, WMV113, WMV114, WMV115, WMV116, WMV117, WMV118, WMV119, WMV120, WMV121, WMV122, WMV123, WMV124, WMV125, WMV126, WMV127, WMV128, WMV129, WMV130, WMV131, WMV132, WMV133, WMV134, WMV135, WMV136, 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